

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

|                                   |   |                              |
|-----------------------------------|---|------------------------------|
|                                   | X |                              |
|                                   | : |                              |
| <i>In re</i>                      | : |                              |
|                                   | : |                              |
| THE FINANCIAL OVERSIGHT AND       | : | PROMESA                      |
| MANAGEMENT BOARD FOR PUERTO RICO, | : | Title III                    |
|                                   | : |                              |
| as representative of              | : | Case No. 3:17-bk-03283 (LTS) |
|                                   | : |                              |
| THE COMMONWEALTH OF PUERTO RICO,  | : | (Jointly Administered)       |
| <i>et al.</i>                     | : |                              |
|                                   | : |                              |
| Debtors. <sup>1</sup>             | : |                              |
|                                   | X |                              |

**APPLICATION FOR ADMISSION PRO HAC VICE**

**TO THE HONORABLE COURT:**

COMES NOW Michael H. Cassel, Esq. (hereafter, the “Applicant”) and, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, as incorporated by Rule 1001-1(b) of the Local Bankruptcy Rules as well as this Court’s *Tenth Amended Notice, Case Management and Administrative Procedures Order* (Docket No. 8027 of Case No. 17-03283 (LTS)) (the “CMP Order”), hereby requests to be permitted to appear and participate in this particular case, in association with the law firm of McConnell Valdés, LLC, and the undersigned members of the bar of this Court, in representation of creditor and party-in-

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

interest Cortland Capital Market Services LLC (“Cortland”), as Administrative Agent for lenders under that certain Credit Agreement, dated as of May 4, 2012 among PREPA, Scotiabank de Puerto Rico, and the lenders party thereto. Applicant respectfully shows:

1. Applicant is an attorney associated with the law firm of Wachtell, Lipton, Rosen & Katz, with offices at:

|               |   |
|---------------|---|
| Address       | WACHTELL, LIPTON, ROSEN & KATZ<br>51 West 52nd Street<br>New York, New York 10019 |
| Email         | MHCassel@wlrk.com   |
| Telephone No. | 212.403.1047  |
| Fax No.       | 212.403.2047  |

2. Applicant will sign all pleadings with the name Michael H. Cassel.

3. Applicant has been retained personally or as a member of the above-named firm by Cortland to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico.

4. Since 2017, Applicant has been and presently is a member in good standing of the bar of the highest court of the State of New York, New York State Bar No. 5554118, where Applicant regularly practices law.

5. Applicant has also been admitted to practice before the following courts:

|                               |                               |
|-------------------------------|-------------------------------|
| <b><u>Court:</u></b>          | <b><u>Admission Date:</u></b> |
| Southern District of New York | 2019                          |

6. Applicant is a member in good standing of the bars of the courts listed in paragraph

5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction. Applicant has no pending disciplinary complaints as to which a finding has been made that such complaint should proceed to a hearing.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. Applicant has not been denied admission to, been disciplined by, resigned from, surrendered his license to practice before, or withdrawn an application for admission to practice before any court or jurisdiction, while facing a disciplinary complaint.

10. Applicant has not previously filed for pro hac vice admission in the United States District Court for the District of Puerto Rico.

11. Local counsel of record associated with Applicant in this matter are:

Nayuan Zouairabani, Esq.  
MCCONNELL VALDÉS LLC  
270 Muñoz Rivera Avenue, Suite 7  
Hato Rey, Puerto Rico 00918  
Telephone: 787-250-5619  
Facsimile: 787-759-9225  
E-mail: [nzt@mcvpr.com](mailto:nzt@mcvpr.com)

12. Applicant has read Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing pro hac vice must comply with the provisions set forth therein and pay an admission fee of \$300 per appearance in each new case before the Court. Accordingly, payment of the pro hac vice admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court."

**WHEREFORE**, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only.

Date: December 18, 2019.

Michael H. Cassel  
Printed Name of Applicant

/s/ Michael H. Cassel  
Signature of Applicant

**I HEREBY CERTIFY THAT**, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, that I consent to the designation of local counsel for all purposes.

Date: December 18, 2019.

Nayuan Zouairabani  
Printed Name of Local Counsel

/s/Nayuan Zouairabani  
Signature of Local Counsel

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 18th day of December, 2019.

**I HEREBY CERTIFY** that on this same date, we electronically filed the document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

**MCCONNELL VALDÉS LLC**  
*Attorneys for Cortland Capital Market Services LLC, as*  
*Administrative Agent*  
270 Muñoz Rivera Avenue, Suite 7  
Hato Rey, Puerto Rico 00918  
Telephone: 787-250-5619  
Facsimile: 787-759-9225

By: s/Nayuan Zouairabani  
Nayuan Zouairabani  
USDC-PR No. 226411  
nzt@mcvpr.com